

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re LEHMAN BROTHERS SECURITIES
AND ERISA LITIGATION :
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This Document Applies To: : No. 09-MD-2017 (LAK)
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Washington State Investment Board v. Fuld, et al., :
No. 09-cv-6041-LAK :
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**DEFENDANT UNICREDIT CAPITAL MARKETS INC'S OPPOSITION TO
PLAINTIFF WASHINGTON STATE INVESTMENT BOARD'S MOTION TO DEPOSE
BANK DEFENDANTS UNDER FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

Defendant UniCredit Capital Markets, Inc. f/k/a HVB Capital Markets, Inc.

("UniCredit"), a defendant in the above individual action, hereby opposes the motion by plaintiff Washington State Investment Board ("WSIB") to depose a UniCredit representative under Federal Rule of Civil Procedure 30(b)(6) (Dkt. # 1229 in 09-md-2017), and joins in the arguments and authorities cited in the Bank Defendants' Opposition¹ dated June 17, 2013. (Dkt. #1232 in 09-md-2017).

¹ Bank Defendants' Opposition to Plaintiffs CALPERS', WSIB's, and American National's Motion to Depose Bank Defendants Pursuant to Federal Rule of Civil Procedure 30(b)(6)

Dated: New York, New York
June 17, 2013

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